BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001

Docket No. R2001-1

INTERROGATORY OF MAGAZINE PUBLISHERS OF AMERICA, INC. TO WITNESS ELIANE VAN-TY-SMITH (MPA/USPS-T13-1) (October 10, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatory to witness Eliane Van-Ty-Smith

Respectfully submitted,

dames rierce wiye

Counsel for MAGAZINE PUBLISHERS OF AMERCIA, INC.

James Pierce Myers Attorney at Law 1617 Courtland Road Alexandria, VA 22306 Phone: 703-660-1002 Fax: 703-660-1037 jpm@piercemyers.com Docket No. R2001-1

MPA/USPS-T13-1. In Section B.2.3 of your testimony, you describe how you developed distribution keys for mail processing cost pools.

- (a) Please identify and describe all differences between the method you are proposing in this case to develop cost pool distribution keys and the method you proposed in Docket No. R2000-1.
- (b) Since the closing of the record in Docket No. R2000-1, has the Postal Service or any of its contractors performed any analyses of the causal relationship between allied mail processing costs and subclasses of mail? If so, please provide a copy of each analysis.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

ames Pierce Myers

Counsel for

MAGAZINE PUBLISHERS OF AMERICA, INC.

October 10, 2001 Alexandria, VA.